

Que 2-3-92 1/31/1992

Certified Mail

1/31/92

Mr. Doug Smith
EPA Region X
1200 6th Avenue/MS ES-098
Seattle, WA 98101

RE: Response from EPA Inspection on 12/18/91 at Pier 91

Facility

Dear Mr. Smith:

The following information concerns questions that were raised during the RCRA inspection which was conducted at the Pier 91 Facility on December 18, 1991. I was informed that you have requested copies of all international hazardous waste manifests for waste received at Pier 91 for the year 1991. Actually, your thorough review of the manifests during your inspection, located all (3) international manifests for 1991. Copies were made of these manifests the day of the inspection. I have made copies of these again for your convenience. Please note these copies also contain any needed corrections that were necessary. I have explained these below.

In addition, I have enclosed a copy of the Pier 91 METRO Discharge Permit for your review, as requested.

Three manifests listed Anderson Newalta as the generator:

- (1) #50194: The shipment was a hazardous waste liquid (containing oil) carrying a DOO8 characteristic waste code. The Burlington Environmental Notification of Exemption Form was incorrectly marked. This waste was recycled by our facility after treatment; therefore, it is exempt from Land Ban regulations. The last box "petroleum product/reused, recycled, or reclaimed for energy recovery" should have been checked;
- (2) #50192 and #50195: These shipments contained wastewater contaminated with lead and carried a characteristic waste code D008. We located the original profile packet which contained a Land Ban Notification Form. A copy of this profile, with the accompanying Land Ban Form is on file at the facility and the corporate office. The generator was sent this form with the waste profile and should have

attached a copy of this Land Ban Form (EZ) with the manifest. Burlington Environmental Inc recognizes that its employees should have checked the manifest packet, upon arrival at the facility of the shipment, for the appropriate Land Ban Form. The generator has been contacted and reminded of the importance of this requirement. In addition, the appropriate employees have been notified of the mistake. A copy of the Land Ban Form for these manifests have been attached to these documents.

Please contact Gary Kollman at 223-0500 with any further question you might have concerning these or other pertinent issues concerning the Burlington Environmental Pier 91 inspection. Thank you for your efforts.

Sincerely,

Gary D. Kollman

Environmental Scientist

Enclosures

cc: Nate Mathews

Dennis Stefani John Stiller



# Newalta Environmental Services corporation

nvironmental Services Corporation

400, 333 Eleventh Avenue S.W. Calgary, Alberta Canada T2R 1L9 Fax: (403) 265-9034 Bus.: (403) 266-6556

HEAD OFFICE:

## Richmond DANGEROUS GOODS SHIPPING MANIFEST A- 4031 **Bill of Lading**

Name: ANDERSON NEWALTA  Address: 12851 No. 5 Road  City, Prov.: Richmond, B.C.  Postal Code: V7A 4E9  24 Hr. Emergency Telephone No. (604) 277 6060	CONSIGNEE  Name: CHEM  Address Box  City, Prov.: No.  Postal Code: Solution Received  Class	ClO5, cattle,	2001 W	Garf	C. C	ompany Nam	☐ Truck [ e:_ANDERS	(YY/MM/DD 95 □ Rail SON NEW Road	ALTA	
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Telephone No: (604) 277-6262			rch 18			stal Code:	V7A 4R	9		
description of dangerous goods	Class	Sub		1891	Se	rial Or Truck				
	1	class	PIN UN	Eorl	Packing Group		f Emergency	Mass or Volume	No.	
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In case of emergency, notify Newalta 228-8880  Protective Directive	on Number	Fa			Ø					
Provincial Emergency Numbers Alberta 1-800-222-6514 B.C. 1-604-387-5956	tion Number Equivalent Level of Safety Permit Number					Permit for Exception Number				
Consignor		Consignee								
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1 - CONSIGNEE'S COPY

2 - CONSIGNOR'S COPY

3 - CARRIER'S COPY



#### RCRA LAND DISPOSAL RESTRICTION NOTIFICATION FORM-EZ

(This form is applicable for characteristic wastes D001-D011 and/or F-listed solvent wastes F001-F005)

20		asses boot-bott and/of r-listed solvent wastes root-	
Chamasa Profile A	Ferries No. 47999	U.S. EPA I.D. No.	111 448 467 <b>2</b> 54 101 95
-Chempro Profile N	No97997	Manifest No.	0145
designated by a c	sheck mark in the associated box(es), is included in	cordance with U.S. EPA regulations, 40 CFR 268.70 this waste shipment and is restricted and banned front standards for F001-F005 wastes, "California List" was	m land disposal unless treated to
Waste Analysis Da	ata are: [ ] Attached	[ ] Not Attached	
		metal-bearing wastes (D004-D011) are listed in 40 CFi active Cyanide (D003) waste are listed in 40 CFR 268.4	
Waste Code	Regulated Hazardous Constituent	Treatability Group	
[ ] D003	Reactive Cyanides based on 261.23(a)(5)	[ ] Wastewater [ ] Nonwastewater	
[ ] D004	Arsenic	[ ] Wastewater [ ] Nonwastewater	[ ] Inorganic Solid Debris
[ ] D005	Barium	-[] Wastewater [] Nonwastewater	[ ] Inorganic Solid Debris
[ ] D006	Cadmium (except Batteries, see below)	[ ] Wastewater [ ] Nonwastewater	[ ] Inorganic Solid Debris
[ ] D007	Chromium	[ ] Wastewater [ ] Nonwastewater	[ ] Inorganic Solid Debris
XD008	Lead (except Lead Acid Batteries, see below)	[ ] Wastewater Nonwastewater	[ ] Inorganic Solid Debris
[] D009	Mercury (< 260 mg/kg Total Mercury)	[ ] Wastewater [ ] Nonwastewater	[ ] Inorganic Solid Debris
[ ] D010	Selenium	[ ] Wastewater [ ] Nonwastewater	[ ] Inorganic Solid Debris
[ ] D011	Silver	[ ] Wastewater [ ] Nonwastewater	[ ] Inorganic Solid Debris
TECHNOLOGY-BA	ASED STANDARDS: The treatment standards express	sed as technology-based standards are listed in 40 Cf	FR 268.42(a).
Waste Code	Waste Description and/or Treatment Subcategory	Treatability Group	Treatment Code
[ ] D001	Low TOC Ignitable Liquids (< 10% Total Organic Co	· day of the control	DEACT
[ ] D001	High TOC Ignitable Liquids (> 10% Total Organic C		FSUBS, RORGS or INCIN
[ ] D001	Ignitable Compressed Gases based on 261.21(a)(3		DEACT
[ ] D001	ignitable Reactives based on 261.21(a)(3)	Not Applicable	DEACT
[] D001	Oxidizers based on 261.21(a)(4)	[ ] Wastewater [ ] Nonwastewater	DEACT
		( )	
[ ] D002	Acid Subcategory, pH < 2	[ ] Wastewater [ ] Nonwastewater	DEACT
[ ] D002	Alkaline Subcategory, pH > 12.5	[ ] Wastewater [ ] Nonwastewater	DEACT
[ ] D002	Other Corrosives based on 261.22(a)(2)	[ ] Wastewater [ ] Nonwastewater	DEACT
[ ] D003	Reactive Sulfides based on 261.23(a)(5)	[ ] Wastewater [ ] Nonwastewater	DEACT
[ ] D003	Explosives 261.23(a)(5), (7) and (8)	[] Wastewater [] Nonwastewater	DEACT
[ ] D003	Water Reactives 251.23(a)(2), (3) and (4)	Nonwastewater	DEACT
[ ] D003	Other Reactives 251.23(a)(1)	[ ] Wastewater [ ] Nonwastewater	DEACT
[ ] D006	Cadmium Containing Batteries	Nonwastewater	RTHRM
[ ] D008	Lead Acid Batteries	Nonwastewater	RLEAD
[ ] D009	High Mercury (> 250 mg/kg Total Mercury) with Or	rganics Nonwastewater	RMERC
[ ] D009	High Mercury (> 260 mg/kg Total Mercury) with Inc	organics Nonwastewater	IMERC or RMERC
RCRA F-LISTED W chemical constitue	ASTE: The treatment standards for F-listed wastes (rent(s), applicable to the hazardous waste in this waste	nonpharmaceutical) are provided on the reverse side on the reverse side on the space provided below	of this form. The specific F-listed
Waste Code	Treatability Group	F-Listed Chemical Constituent(s)	Treatment Standard
[ ] F001	[ ] Wastewater [ ] Nonwastewater		see reverse side
[] F002	[ ] Wastewater [ ] Nonwastewater		see reverse side
[ ] F003	[ ] Wastewater [ ] Nonwastewater	**	see reverse side
[] F004	[ ] Wastewater [ ] Nonwastewater		see reverse side
[ ] F005	Wastewater     Nonwastewater		see reverse side
			and reverse side
CALIFORNIA LIST in 40 CFR 268 32 a	and RCRA 3004(d). Treatment standards are provided	is waste snipment exceeds the following "California Ld on the reverse side of this form. If applicable, the requids $\geq 50$ ppm $-\{-\}$ Equids with restricted metals	stricted metal present is circled.

	MASTE MANIFEST	1. Generator's U. WAD98846		Manifest Document No. 50192	2. Pag	1	ot requi	ired by Fe	shaded arederal law.	
1	crars Name and Mailing Address	NTAL SERVICE	ES CORPORATIO	N	A. Sta	te Manife:	st Docum	nent Num	ber ः	A
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ANDE	RSON NEWALTA ENVIRONME	NTAL SERVICE	S. MAD988467	254					277-6	262
7. Trans	sporter 2 Company Name		8. US EPA ID	Number		te Transpo		)		F 400
						nsporter's			V-174	
CHEM	gnated Facility Name and Site Address ICAL PROCESSOR, INC.		10. US EPA ID			ate Facility				4 - 3
Box (	C105, 2008 W. Garfield	St., Seatt	le, WA, 98119   WAD00081291		1	cility's Phor 16) 28		50		
11. US	DOT Description (Including Proper Shippi	ng Name, Hazard Cla	ss, and ID Number)	12. Co	ntainers	13 Tot		14. Unit	1.	**
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### RCRA LAND DISPOSAL RESTRICTION NOTIFICATION FORM-EZ

enerator:	Ferries No. 47999		U.S. EPA I.D. No	WAD988 467254 0192
	is submitted to Chempro's treatment facility in accordancheck mark in the associated box(es), is included in this wicated. The reverse side of this form provides treatment stan	aste shinment and is re	estilicied and barried	Horri laria dispersa america menere
Vaste Analysis C	Data are: [ ] Attached [ ] No	ot Attached		
CONCENTRATION OF REPORT CONCENTRATION CFR 268.41 (a	ON-BASED STANDARDS: The treatment standards for metal- ) for nonwastewaters. The treatment standards for Reactive	bearing wastes (D004-E Cyanide (D003) waste a	D011) are listed in 40 C are listed in 40 CFR 26	CFR 268.43(a) for wastewaters and 8.43(a).
Vaste Code	Regulated Hazardous Constituent	Treatability Group	[ ] Nonwastewater	
] D003	Reactive Cyanides based on 261.23(a)(5)	[ ] Wastewater	Nonwastewater	[ ] Inorganic Solid Debris
] D004	Arsenic	[ ] Wastewater	Nonwastewater	[ ] Inorganic Solid Debris
] D005	Barium	[ ] Wastewater	Nonwastewater	[ ] Inorganic Solid Debris
] D006	Cadmium (except Batteries, see below)	[ ] Wastewater	1 Nonwastewater	[ ] Inorganic Solid Debris
D007	Chromium	[ ] Wastewater	M Nonwastewater	[ ] Inorganic Solid Debris
X D008	Lead (except Lead Acid Batteries, see below)	[ ] Wastewater	x	[ ] Inorganic Solid Debris
] D009	Mercury (< 260 mg/kg Total Mercury)	[ ] Wastewater	[ ] Nonwastewater	1 Inorganic Solid Debris
] D010	Selenium	[ ] Wastewater	[ ] Nonwastewater	[ ] Inorganic Solid Debris
] D011	Silver	Wastewater	[ ] Nonwastewater	[ ] morganic sond beons
ECHNOLOGY-	BASED STANDARDS: The treatment standards expressed as	s technology-based sta	ndards are listed in 40	CFR 268.42(a).
	Waste Description and/or Treatment Subcategory	Treatabil	ity Group	Treatment Code
Vaste Code	Low TOC Ignitable Liquids (<10% Total Organic Carbon			DEACT
] D001	High TOC Ignitable Liquids (> 10% Total Organic Carbon			FSUBS, RORGS or INC
] D001		Not Appl		DEACT
] D001	Ignitable Compressed Gases based on 251.21(a)(3)	Not Appl		DEACT
D001	Ignitable Reactives based on 261.21(a)(3) Oxidizers based on 261.21(a)(4)	[ ] Wastewater	[ ] Nonwastewater	DEACT
•		[ ] Wastewater	[ ] Nonwastewater	DEACT
] D002	Acid Subcategory, pH < 2	[ ] Wastewater	Nonwastewater	DEACT
] D002	Alkaline Subcategory, pH > 12.5	[ ] Wastewater	Nonwastewater	DEACT
] D002	Other Corrosives based on 251.22(a)(2)	[ ] Wastewater	[ ] Nonwastewater	
1 D003	Reactive Sulfides based on 261.23(a)(5)	[ ] Wastewater	[ ] Nonwastewater	DEACT
) D003	Explosives 261.23(a)(5), (7) and (8)	[] Wastewater	[ ] Nonwastewater	DEACT
] D003	Water Reactives 261.23(a)(2), (3) and (4)	Nonwas	tewater	DEACT
] D003	Other Reactives 251.23(a)(1)	[ ] Wastewater	[ ] Nonwastewater	DEACT
] D006	Cadmium Containing Batteries	Nonwas	tewater	RTHRM
D008	Lead Acid Batteries	Nonwas	tewater	RLEAD
D009	High Mercury (≥ 260 mg/kg Total Mercury) with Organi	cs Nonwas	tewater	RMERC
[ ] D009	High Mercury (> 250 mg/kg Total Mercury) with Inorgan		tewater	IMERC or RMERC
RCRA F-LISTE	D WASTE: The treatment standards for F-listed wastes (nonp	harmaceutical) are pro-	vided on the reverse si	ide of this form. The specific F-lis
chemical const	ituent(s), applicable to the hazardous waste in this waste shi	oment, are indicated in	the space provided be	elow.
Waste Code	Treatability Group F-List	ted Chemical Constitue	ent(s)	Treatment Standard
F001	Wastewater     Nonwastewater			see reverse side
	Wastewater   Nonwastewater			see reverse side
[ ] F002 [ ] F003	Wastewater   Nonwastewater	3.5		see reverse side
	[   Wastewater   ] Nonwastewater			see reverse side
[ ] F004				see reverse side
[ ] F005	[ ] Wastewater [ ] Non-wastewater			
CALIFORNIA L	IST RESTRICTIONS. The hazardous waste included in this w	aste shipment exceeds	the following "Californ	nia List" prohibition levels as set fo
in 40 CFR 268.	32 and RCPA 3004(d) Treatment standards are provided on	the reverse side of this	s form, it applicable, the	ne restricted metal present is circi

#### **WASTE RECEIPT**

35843 -2

CHEMA 20CESSORS, INC. Frer 91 Seattle, King County Date 3-14 19 91 Washington 98119 Bill To: Name Address Waste Generator: Name And such Thewalter Fasia Address \_ Hauler: Name Anderson The Colty ENDINE Price/Unit Total Waste Description Quantity Container 4200 GALLONS Waste Witer BS & W Comments: 10 111 9 164 Cold 2000 FPM F Chrome Pos. 50% 6000 P&m B Phenol Pos. 1000 PPMC ph 9,8 mote Received by Shipper 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name Signature KLTON ALLEN (for Anderson Newalta) 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature LES SPENCE (for Anderson newalta) 18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Year 10 W 91

29-5-24

Printed/Typed Name

03 18

100000000000000000000000000000000000000	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's U. WAD98846		Manifest 195 No	2. Pag		Informat not requ	ired by Fe	shaded a ederal law.	reas is
3. Gene	erator's Name and Mailing Address	BWAT CERUIC	PC COPRORITIO	. 707	A. Sta	te Manif	est Docur	ment Num	ber	
1285	RSON NEWALTA ENVIRONMENT 11 No. 5 Road, Richmond, erator's Phone ( 604) 277-6262	, B.C., V7		774	B. Sta	te Gener	rator's ID	4 5		
	sporter 1 Company Name	TAL SERVIC	6. US EPA ID ES WAD988467			te Transp nsporter	porter's II	(604)	277-6	262
	sporter 2 Company Name		8. US EPA ID				orter's ID			
/ mans	sporter 2 company reason		1		-	nsporter's				,
CHEM	gnated Facility Name and Site Address IICAL PROCESSOR, INC. (1		10. US EPA ID	Number	G. Sto	ite Facilit	ty's ID	a.		
	C105 2001 W. Garfield State, WA 98119	St.	WAD00081291	7		cility's Pho 06) 2	one <b>84-2</b> 4	50		#3
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HM				No.	Туре		antity	Wt/Vol	Waste	No.
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CHEMICAL PROCESSORS, INC. Pier 91 Seattle, King County		WASTE RECEIPT			35849 -2
Washington 98119				Date 3	3-15 1991
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Address				7 2	3.60
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Address					
Hauler: Name	deison Ti	en alta			
Waste Description	Quantity	Container		Price/Unit	Total
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	Name and Mailing Add		ICES	CORPORATION		A. Sta	te Manif	est Docur	ment Num	ber	
	851 No. 5 Road, Rich Generator's Phone (604) 277	mond, B.C., V				B. Sta	te Gener	rator's ID			
	Fransporter 1 Company Name	BAND TRANSPORT	6.	US EPA ID N		-		porter's IC		A77 (	0/0
	DERSON NEWALTA ENVII	KURMENTAL SERV	8.	<b>■AD9884672</b> US EPA ID N		-		's Phone porter's ID		277-6	26Z
7. 1	ransporter 2 company Name		1 .				nsporter'			•	
CHI	Designated Facility Name and Site A	AC.	10.	US EPA ID N	umber	G. Sto	ite Facilit	ty's ID			1 1
Box	x C105, 200@ W. Cari	field St., Sea		WA, 98119 WAD000812917		1	ility's Ph	one <b>84-</b> 24	50	з	
11.	US DOT Description (Including Prope	er Shipping Name, Hazard	d Class, a	and ID Number)	12. Cont	ainers		13. otal	14. Unit	t:	
	нм				No.	Туре		antity	Wt/Vol	Waste	No.
a.	X Hazardous Waste I ORM-E NA9189 (DO	-			01	TT	4200		c	D008	
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#### RCRA LAND DISPOSAL RESTRICTION NOTIFICATION FORM-EZ

(This form is applicable for characteristic wastes D001-D011 and/or F-listed solvent wastes F001-F005)

Generator: 1	36 Ferries				U.S. EPA I.D. No.	WAN988467254			
«Chempro Profi	le No. 4799	19		U.S. EPA I.D. No					
designated by	a check mark in the	associated box(es), is include	ded in this wa	ste shipment and is	egulations, 40 CFR 268 s restricted and banned	5.7(a)(1). The hazardous waste, as from land disposal unless treated to wastes, and applicable variances.			
Waste Analysis	Data are:	[ ] Attached	[ ] Not	Attached					
		ARDS: The treatment standards ers. The treatment standards				CFR 268.43(a) for wastewaters and in 8.43(a).			
Waste Code	Regulated Haz	ardous Constituent		Treatability Group	ρ				
[ ] D003	Reactive Cyani	des based on 261.23(a)(5)		[ ] Wastewater	[ ] Nonwastewater				
[] D004	Arsenic			[ ] Wastewater	[ ] Nonwastewater	[ ] Inorganic Solid Debris			
[ ] D005	Barium			[ ] Wastewater	Nonwastewater	[ ] Inorganic Solid Debris			
[ ] D006	Cadmium (exc	ept Batteries, see below)		[ ] Wastewater	[ ] Nonwastewater	[ ] Inorganic Solid Debris			
1 D007	Chromium			[ ] Wastewater	[ ] Nonwastewater	[ ] Inorganic Solid Debris			
DKD008		ead Acid Batteries, see below	r)	[ ] Wastewater	Nonwastewater	[ ] Inorganic Solid Debris			
[ ] D009		0 mg/kg Total Mercury)		[ ] Wastewater	[ ] Nonwastewater	[ ] Inorganic Solid Debris			
[ ] D010	Selenium			[ ] Wastewater	[ ] Nonwastewater	[ ] Inorganic Solid Debris			
[ ] D011	Silver			Wastewater	[ ] Nonwastewater	[ ] Inorganic Solid Debris			
TECHNOLOGY	Y-BASED STANDARD	<u>)S: The treatment standards (</u>	expressed as t	echnology-based st	tandards are listed in 40	OFR 268.42(2).			
Waste Code	Waste Descript	ion and/or Treatment Subcat	egory	Treatab	oility Group	Treatment Code			
[ ] D001		able Liquids (< 10% Total Org			stewater	DEACT			
[] D001	High TOC Ignit	able Liquids (≥ 10% Total Org	ganic Carbon)	Nonwa	stewater	FSUBS, ROAGS or INCO:			
[ ] D001	Ignitable Comp	pressed Gases based on 261.	21(a)(3)	رک ۱۵۱	plicable	DEACT			
[ ] D001	ignitable React	ives based on 261.21(a)(3)		No: Ap	plicable	DEACT			
[ ] D001	Oxidizers base	d on 261.21(a)(4)		[] Wastewater	[ ] Nonwastewater	DEACT			
[ ] D002	Acid Subcateg	orv. pH < 2		[ ] Wastewater	Nonwastewater	DEACT			
[ ] D002		tegory, pH > 12.5		[ ] Wastewater	Nonwastewater	DEACT			
[] D002		es based on 251.22(a)(2)		[] Wastewater	[ ] Nonwastewater	DEACT			
[ ] D003	Beactive Sulfid	es based on 251.23(a)(5)		[ ] Wastewater	[ ] Nonwastewater	DEACT			
[ ] D003		.23(a)(6), (7) and (6)		[ ] Wastewater	Nonwastewater	DEACT			
[ ] D003		s 261.23(a)(2), (3) and (4)			stewater	DEACT			
[ ] D003	Other Reactive			[ ] Wastewater	[ ] Nonwastewater	DEACT			
[ ] D006	Cadmium Con	taining Batteries		Noowa	stewater	RTHRM			
[ ] D008	Lead Acid Batte				stewater	RLEAD			
[ ] D009		> 260 mg/kg Total Mercury)	with Ornanics		stewater	RMERC			
[ ] D009		260 mg/kg Total Mercury)	_		stewater	IMERC or RMERC			
		ment standards for F-listed wi to the hazardous waste in thi				de of this form. The specific F-listed low.			
Waste Code	Trea:ability Gro	CUC	F-Listed	Chemical Constitu	ent(s)	Treatment Standard			
[ ] F001	[ ] Wastewate					see reverse side			
[ ] F002	[ ] Wastewate					see reverse side			
[ ] F003	[] Wastewate	r [] Nonwastewater				see reverse side			
[ ] F004	[ ] Wastewate	r [] Nonwastewater				see reverse side			
[ ] F005	[ ] Wastewate	r [] Nonwastewater				see reverse side			
in 40 CFR 268.	32 and RCPA 3004(c	d). Treatment standards are p	provided on the	e reverse side of thi		a List" prohibition levels as set (5115) a restricted metal present is circled			
[ ] HOCs > 1	) [ ] mqq 000,	Cyanides ≥ 1,000 ppm []	PCB liquids >	50 ppm [ ] Lic	quids with restricted met.	als, Hg, Ni, Se, Th, as circled			